

# **Successful Practices in Title III Implementation**

Chemical Emergency  
Preparedness and Prevention  
Technical Assistance Bulletin

**Natrona County, Colorado  
Erie County, New York  
State of Arizona  
Mohave County, Arizona  
Subject Index**





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## ABOUT THIS BULLETIN

This is another in a series of bulletins that EPA is issuing to provide examples of implementation programs and strategies of the Emergency Planning and Community Right-to-Know Act of 1986, known as Title III, that are innovative or have proven effective. The purpose of these bulletins is to share information on successful practices with Local Emergency Planning Committees (LEPCs), State Emergency Response Commissions (SERCs), fire departments, and other Title III implementing agencies throughout the country in the hope that such information will prove useful to other SERCs and LEPCs as their programs develop and evolve.

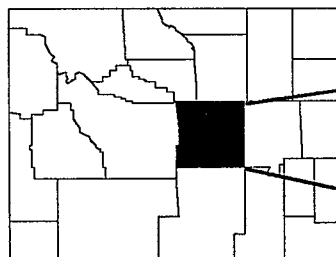
Elements from the programs featured here may be transferable to other programs in similar communities or with similar situations. The bulletins provide information on a variety of practices — for example, planning, compliance, information management, hazards analysis, and outreach. The particular topics covered in each LEPC or SERC profile are listed in the box at the bottom of the first page of the profile for easy reference, along with descriptions of the planning district or state and LEPC or SERC membership.

The descriptions of the innovative and effective implementation programs and strategies are not exhaustive. They are meant to provide readers with enough information to determine if a particular approach is applicable to their own situation. Each profile includes a contact person who can provide more detailed information.

For your convenience, a subject index covering the contents of the nine **Successful Practices** bulletins has been included in this bulletin. The index is designed to allow the reader to identify successful Title III implementation practices by topic area, and then locate the **Successful Practices** bulletin in which the practice was profiled. Details on all nine bulletins, and how to order them, are provided on page 18.

If you know of Title III implementation efforts you feel would be of interest to others and that we should identify in **Successful Practices**, please contact your EPA Regional Chemical Emergency Preparedness and Prevention coordinator (see the list on page 19), or the Emergency Planning and Community Right-to-Know Information Hotline at (800) 535-0202.





## Natrona County, Wyoming

**T**he Natrona County LEPC, in coordination with EPA Region 8, has embarked upon a Title III outreach and compliance campaign throughout the county. The LEPC has made a concerted effort to educate both industry and the public about Title III. The committee holds at least two meetings per year, and has five distinct subcommittees which address plan modification and update, evacuation, community awareness, training and exercises, and response and preparedness. The LEPC has a relatively large staff and a good working relationship with area businesses. The chair of the LEPC is the coordinator of the county Emergency Management Agency (EMA) and a law enforcement officer in the county sheriff's office in Casper — the county's largest city with a population of nearly 47,000. This situation has resulted in the EMA taking a leading role in Title III implementation for Natrona County.

### Compliance

**B**efore an outreach and compliance program could begin, the Natrona County LEPC needed to identify facilities within the county that must report under Title III. With assistance from the U.S. EPA Region 8 office in Denver, the LEPC began to target facilities using several methods. First, the LEPC identified a number of facilities simply by using the business section of the local telephone book and by visiting facilities listed under subjects related to gasoline and chlorine use. In addition, the LEPC identified possible reporters using computerized data bases provided by the EPA regional office. These data bases included the names of facilities on the Resource Conservation and Recovery Act (RCRA) Notifiers List, the List of Registered Underground Storage Tanks (USTs), and the section 313 Toxic Release Inventory (TRI) reporting list. By crossing out the names of

### LEPC Profile

Membership:	39 members, including representatives from law enforcement, fire and rescue services, health department, education, industry, county and municipal government, emergency management, county agricultural extension office, news media, hospitals, American Red Cross, and private citizens.
Population:	61,000
Facilities:	20 facilities have reported under section 302, and 161 have reported under sections 311/312 of Title III, including petroleum production and refining facilities, chemical manufacturers, and utilities.
Topics:	Compliance Outreach Exercises

facilities listed in these data bases that were out of business, the Natrona County LEPC was able to compile a target list of potential Title III reporting facilities that had reported under the requirements of other statutes.

Because fire fighters are often familiar with the types of chemicals in use at a facility, and may also have an established relationship with facility management, fire departments can be another valuable source of information about potential Title III reporters. The Natrona County LEPC has supplied local fire departments with Title III information packets to deliver to companies during scheduled fire safety inspections. The packets include a list of Title III reporting requirements, a list of Title III contacts and telephone numbers, and a cover letter asking companies to supply a list of their chemicals to the LEPC to determine if the facility is required to report. Through close coordination with local fire departments, the Natrona County LEPC was able to reach a larger audience with its Title III message than might otherwise have been possible.

Following these initial efforts, the Natrona County LEPC compiled a list of facilities identified through the use of the data bases, telephone books, fire department inspections, and other sources. The LEPC then carefully reviewed the list, eliminating all duplicates and business closures, and concluded with a list of 260 potentially covered facilities that had not reported under Title III. To each facility on the list, the Natrona County LEPC sent a letter that included a Title III fact sheet, a response postcard, and phone numbers for questions. The response postcards presented the facility representative with four response options: (1) reported under Title III; (2) aware of Title III, but do not need to report; (3) uncertain if need to report; and (4) have questions on Title III and would like to attend an informational meeting to discuss reporting requirements. Along with these materials, the initial package included a list of *Federal Register* notices concerning Title III; FEMA and EPA publications on Title III; and information on Natrona County's hazardous materials planning efforts.

Prior to these compliance efforts by the Natrona County LEPC, 89 facilities had reported under

various sections of Title III. Within 90 days of sending the initial letters and response postcards to the facilities, the Natrona County LEPC received 20 new submissions of Title III reports, and identified an additional 64 facilities who appeared to be required to report. Follow-up letters were sent to those facilities that did not respond to the initial information package. As of March 1992, compliance efforts resulted in 72 additional facilities reporting under Title III (for a total of 161 facilities), an increase of more than 80 percent.

### Outreach

**B**ecause some facilities either misunderstood the Title III reporting requirements or ignored them, the Natrona County LEPC developed and conducted a workshop for industry to explain requirements and issues associated with Title III reporting in more detail. The workshop covered a variety of topics, including business confidentiality, release notification procedures, compliance with Title III sections 311 and 312, facility emergency planning, and civil and criminal penalties. To publicize the workshop, the LEPC issued several press releases for publication in the local newspaper and promoted the workshop at several emergency exercises in which industry participated. Facilities for the workshop were obtained from the local Agricultural Extension Office free of charge.

The Natrona County LEPC provided numerous informational materials at the workshop. The LEPC customized copies of the Title III requirements to include names and phone numbers of representatives of the Natrona County LEPC and the Wyoming state emergency response commission (SERC). In addition, the LEPC compiled and made available a schedule of hazardous materials training courses offered by fire and police departments, hospitals, large local companies, and other organizations. Other documents handed out at the workshop include OSHA guidelines on hazard communications standards; related worker right-to-know materials; EPA's *List of Lists*, detailing reporting levels for specific chemicals under various statutes; and other pamphlets and EPA publications obtained for free from the EPA regional office.

At the request of industry representatives attending the workshop, the Natrona County LEPC has made its members available for one-on-one meetings to provide a more company-specific, personalized approach than is possible at a workshop. To date, the LEPC has conducted about 20 one-on-one meetings with representatives of potential reporting facilities and has found the meetings to be often more fruitful than the full-scale workshops.

Several success stories have resulted from these meetings. Following one such meeting, a bulk fuel distributor located in Casper provided the LEPC with a list of its hazardous chemicals, a site-safety plan, and a facility map detailing specific areas where each hazardous chemical is stored on site. This information was accompanied by an invitation to LEPC members to tour the plant for more information. Another successful one-on-one meeting involved the Parks and Recreation Department of the City of Casper. After meeting with the Natrona County LEPC, the Parks Department identified a number of facilities and locations operated by the city where fuels, fertilizers, herbicides, chlorine, and other drinking and waste water treatment chemicals were stored. The LEPC has remained in close contact with the Parks Department after the meeting, and has assisted department officials in filing thorough Tier II reports with the LEPC.

### Exercises

**E**xercises conducted with the cooperation of industry, local responders, and the Natrona County LEPC have tested emergency response procedures while furthering the cause of informing industry and the public about Title III. Consider the following scenario. On the afternoon of September 17, 1990, just outside the gates of the Nalco Chemical Company on Old Glenrock Highway in Casper, the driver of a commercial transit bus suffered a heart attack, lost control of the vehicle, and sent the bus crashing into the side of a tanker truck containing thousands of gallons of flammable and corrosive liquids. Fortunately, this description is not from an actual occurrence, but from an exercise developed by the Natrona County LEPC in coordination with Nalco Chemical and various emergency responders.

### Information Management

Several agencies in Natrona County and the City of Casper are in the process of improving the 911 emergency center by installing a computer-aided dispatch system. This system would send Title III information by modem from EMA's Emergency Information System (EIS) software package, which stores chemical, facility, transportation, and other planning and response information, to the 911 system. When installation of the improved dispatch system is complete, first responders will have information on buildings and stored chemicals before they enter the premises. For field operations, the Natrona County EMA and LEPC used emergency management funds to purchase a laptop computer that can access information from the EIS software in the main office. Use of this new computer will provide facility-specific information to the EMA in the field for both emergency and non-emergency situations.

To improve its software capabilities, the Natrona County LEPC has installed dBase IV in addition to the EIS software on their office system. When the annual Title III reports come in, the LEPC adds the contents of each form to the office system. Currently, the Natrona County LEPC is planning to expand this information system to increase the amount of data, and make it more accessible to other agencies. To supplement this information, the LEPC also remains in close contact with the Casper Fire Department, which uses the Computer-Aided Management of Emergency Operations (CAMEO) software to aid in emergency planning and response to hazardous material accidents.

Preparation for this exercise included working with the news media to videotape the event, consultation with participating emergency responders, and solicitation of an old tanker truck from Nalco Chemical. Personnel from the Nalco response team, three fire departments, two ambulance services, and four law enforcement agencies responded to the "incident," and were directed at the scene by the EMA. Roadblocks were set along the highway with vehicles from the highway patrol and sheriff's department, and medical personnel treated about 20 "casualties" from the bus at the scene.

Several lessons learned by participants in this and other exercises have shed light on the strengths and weaknesses of the local emergency response plan. Communication among responders was constant during the Nalco Chemical exercise, keeping response efforts organized. Law enforcement personnel were able to prevent public access to the area surrounding the facility quickly and efficiently. Media coverage of the dramatic exercise has increased community and industry awareness of the Title III message; for instance, Nalco Chemical has since modified its tape of the exercise into a chemical safety awareness video for use in training new employees at all of the company's facilities.

Lessons were also learned through response shortcomings. During the Nalco exercise, responders did not dedicate a specific area near the scene for on-site medical treatment or for transport of accident victims to local hospitals. Although public and emergency notification of the "accident" was timely, Nalco Chemical did not alert all of its workers to the exercise unfolding outside their building. Since the exercise, medical procedures for emergency medical personnel and hospitals have been modified and are now incorporated in the community emergency plan. In addition, Nalco Chemical has improved its procedures for alerting all employees to an emergency.

## LESSONS LEARNED

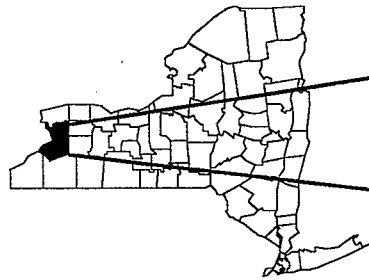
**Industry and Emergency Responders Must Be Informed and Involved.** Outreach has been the foundation for all the work of the Natrona County LEPC. Its central goal is to deliver the message to facilities and to the emergency response community that Title III is everyone's responsibility. The more that an LEPC strives to deliver this message and the more members of the emergency response community become informed and involved, the better each responder will perform in an actual emergency.

**The Natrona County LEPC Doesn't Like Surprises.** Through exercises performed in conjunction with local industry and response personnel, the Natrona County LEPC has discovered some areas of vulnerability in its response plan and procedures that it has subsequently worked to resolve. By solving unexpected response problems during simulations and full-scale exercises, the Natrona County LEPC has helped to prevent unwanted surprises from hampering responders during actual emergencies.

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## Erie County, New York

**E**rie County is located in western New York, south of Niagara County and sharing a border with the Regional Municipality of Niagara, Province of Ontario, Canada, along the Niagara River. The largest community is Buffalo, with a population of 334,000; there are also 25 towns, 16 villages, and two other cities in the county.

Erie County has a full-time LEPC coordinator, the first appointed in the state, although administrative support is provided by the Erie County Department of Emergency Services' (DES) Office of Disaster Preparedness and the Erie County Department of Environment and Planning.

### International Coordination

**T**he region consisting of Erie County, Niagara County, and the Municipality of Niagara has considerable transportation and use of hazardous materials, which translates into an ever-present threat around and across the international border. For example, on November 11, 1979, a train with alternating rail cars of propane and chlorine derailed and caught fire near the city of Mississauga, in the Province of Ontario, Canada, requiring the evacuation of 240,000 residents over several days, one of the largest evacuations in North American history. Recently, in December 1989, a ship went aground in the Buffalo Harbor carrying over

### LEPC Profile

Membership:	30 members, including representatives from local and county emergency services, fire safety, emergency medical services, environment and planning, civil defense and disaster preparedness, and police, sheriff, fire, and health departments; state senate; media; Niagara Frontier Transportation Authority; hospitals; Citizen's Action Organization; private citizens, including medical and legal professionals; and industry (chair: industry representative).
Population:	969,000
Facilities:	834 reporting under section 312, and 175 under section 302, including communication centers, sewage and waste water treatment facilities, ice rinks, and manufacturing, warehousing, and cold storage facilities.
Topics:	International Coordination Exercises Training Emergency Response

600,000 gallons of toluene, a carcinogen. Lastly, in May 1990 the plume of a chemical release from Rich Products in Buffalo was detected across the border in Canada.

Recognizing the potential for a disaster in the border region, the United States and Canada signed an *Agreement on Cooperation between the United States and Canada on Civil Emergency Planning* in August of 1986. Meanwhile, also prior to the passage of SARA Title III, attempts were being made to establish a joint disaster planning effort between Erie County, the City of Buffalo, Niagara County, and the Province of Ontario. During the next two years, after reviewing hazardous substance inventories obtained under Title III, local officials recognized that the existing planning effort had to be intensified. Because a variety of issues relating to immigration, customs, and border bridge authorities needed to be examined to determine how to coordinate cross-border response activities, an International Joint Committee on Emergency Planning was formed, consisting of representatives from LEPC member agencies in Erie and Niagara counties, and similar agencies in Ontario.

The first product of the international committee emerged on March 15, 1989, when the Regional Municipality of Niagara, Ontario, and the Counties of Erie and Niagara signed an agreement addressing emergency planning and response for major incidents or disasters that would impact any of the border communities. The signing of this agreement, however, was just the first stage in the international coordination process. A variety of planning sessions, training programs, and meetings have been held with the local law enforcement community, fire service personnel, emergency medical and health officials, social services agencies, customs and immigration people, bridge authority commissioners, the military, and various other response groups.

The coordination process continued in 1991 with the signing of a Memorandum of Understanding that defines the guidelines and parameters for the unimpeded and mutual use of manpower, equipment, and other resources during emergencies that would affect any portion of the border area between Canada and Erie and Niagara counties. The agreement is designed to improve public safety for citizens on both sides

of the border by providing an effective, immediate response to any major emergency or disaster. It also ensures that the current federal and state (and provincial in Canada) benefits provided to police officials, firefighters, and other emergency responders (e.g., death benefits, worker's compensation, etc.) are continued when they are engaged in emergency response operations on either side of the border, and delineates financial responsibilities for damage to equipment and use of manpower. Standard operating procedures for the implementation of the Memorandum of Understanding are incorporated in a cross-border contingency plan that serves as an annex to the existing contingency plans in the three participating areas.

The signing of the international agreement kicked off the planning for a major exercise, Operation Big 3 (Disaster Exercise), held on September 14, 1991. This massive exercise at the Greater Niagara Falls International Airport was designed to test the effectiveness of the Memorandum of Understanding and all the unique planning efforts that went into the international agreement. The exercise was a simulated air disaster involving approximately 450 casualties, 50 hospitals, and well over 3,000 participants, including the Erie County Health Department and the Department of Emergency Services, and a variety of American and Canadian response agencies — law enforcement, emergency health and medical responders, fire service, and airport response teams — as well as many other support groups. This exercise also activated the United States' National Disaster Medical System, which supplements and assists local governments' medical resources when they are overwhelmed by the magnitude of any incident or disaster.

### Exercises

**I**n addition to international coordination, over the past few years the Erie County DES and the Crash/Fire/Rescue Division at the Greater Buffalo International Airport have been working together in an attempt to enhance response capabilities in the event of an air disaster. Because over 90 percent of air disasters occur off airport property, planning exercises, meetings, and seminars have brought together a great number of organizations that must interact in the response to an air disaster or any other

type of mass casualty incident. A series of exercises, both full scale and table-top, have been conducted through the joint efforts of airport authority and Erie County DES. One of the largest of these exercises was "Orbit Sage '89," a mass casualty simulation that was conducted simultaneously in Erie County and at other locations in New York, Pennsylvania, Connecticut, and Canada. The achievements of the air disaster planning process were formalized with the signing of the first mutual aid agreement between the airport authority and the local volunteer fire departments.

On October 11, 1990, DES and Crash/Fire/Rescue Division conducted a second mass casualty exercise with the National Disaster Medical System, involving a number of federal, state, and local agencies. The scenario simulated the reception of victims in Erie County from a massive earthquake, occurring along the Madrid Fault, in Arkansas, where seismographic data predict that an earthquake will occur in the future. In this table-top exercise, earthquake victims received triage at the airport and were then sent to a variety of area hospitals, including Canadian facilities. The existing provisions of the international agreement were activated and proved to be a tremendous asset to the county, triggering the involvement of local Canadian emergency planners, hospitals, communications, law enforcement agencies, and other resources.

### Training

To further expand the emergency exercise program, the LEPC recently began implementation of the Public Safety Critical Incident Management system, a table-top, emergency simulation methodology. First developed in Monroe County, New York, the system involves the use of simulator boards (HO-scale models of communities originally designed for training police personnel and thus easily adaptable to general emergency response scenarios). The simulator board system is used to examine operational concerns and responsibilities of participating response organizations under a unified emergency operations command structure. A 16-hour training course, consisting of lectures and exercises, is offered through the New York State Emergency Management Office to fire, emergency medical services, police, and business and industry representatives. The

LEPC has already conducted a train-the-trainer workshop for 32 local fire, emergency medical, and police officials, and hopes to disseminate the system to personnel from local response agencies through community colleges.

### Emergency Response

To support the efforts of response agencies in communities both with and without their own hazmat team, the Erie County Hazardous Materials Organization was formed. This all-volunteer hazmat response team operates under the direction of DES, and provides technical, command, security, and decontamination assistance. The team has full Level A response capability and is available for response to any area without a hazmat team or to assist an existing hazmat team. The organization does not take control of incidents to which it is called; command control remains with the local incident commander. The team is available via a 24-hour hotline and does not bill municipalities or fire departments for the costs incurred at an

### Settlement of Citizen Suits

The settlement of several citizen suits filed under section 326 of Title III has provided funding for various local emergency planning and response efforts in Erie County, including the county response team, outreach activities, and contingency planning. On December 11, 1990, agreements were reached in the first two cases settled nationally under the citizen suit provisions of Title III. After a review of the TRI database and the sections 311-312 submissions from ARO Corporation of Buffalo and Murray Sandblast and Paint Company of West Seneca, the Atlantic States Legal Foundation filed citizen suits alleging that these companies had failed to meet the annual release reporting requirements of section 313 for 1987 and 1988. Under the settlements, ARO Corporation agreed to pay \$34,000, and Murray Sandblast agreed to pay \$10,000 and institute a pollution prevention and toxics use reduction program.

A third citizen suit filed against Allied Signal, Inc., of Buffalo also alleging section 313 violations was settled on January 3, 1991. Allied Signal agreed to pay a penalty of \$17,000 (of which \$13,500 will be given to the Erie County LEPC) and also to comply with section 313 requirements for the 1990 reporting year and beyond. Altogether, the LEPC has received approximately \$50,000 in these and other citizen suit settlements to finance the Erie County Hazardous Materials Organization.

incident. Instead, the team bills the responsible party — the transporter, the facility owner, or the product manufacturer. In addition, the county has funded the purchase of a Mobile Command Post, equipped with a CAMEO system loaded with 750 facility reports, and several local companies have donated response equipment (e.g., a decontamination tent and emergency breathing apparatus) and provided equipment maintenance services to support the team's efforts.

Following a chemical fire in 1987, in which several firefighters were injured, the LEPC began formally addressing the decontamination of chemical accident victims. First, the LEPC's Hospital Subcommittee conducted a survey of all Erie County hospitals to determine their current ability to manage the decontamination process in emergency rooms. All 15 local hospitals were evaluated, and the LEPC established a set of formal decontamination protocols, which have since been distributed to the hospitals through the Western New York Hospital Association. In addition, emergency room personnel from several area hospitals have received training in conjunction with the county's mobile decontamination unit described below. Erie County has also funded the purchase of a 35-foot trailer equipped with a portable decontamination unit. This vehicle allows firefighters to be decontaminated on location before being sent by ambulance to a hospital, thus eliminating the potential of contaminating ambulances or emergency rooms. During its first year, the Erie County Hazardous Materials Organization used the trailer to assist in decontaminating firefighters and other personnel at four separate incidents.

## LESSONS LEARNED

**International Coordination Follows Path of LEPC.** Many of the issues related to developing and implementing the international agreement follow the trail blazed by the Erie County LEPC. The initial success of the international agreement along the border between New York and Ontario can be traced to the same cooperative spirit that supports the Erie County LEPC, carried out on a greater scale with literally scores of participating entities. In addition, the creation of a cross-

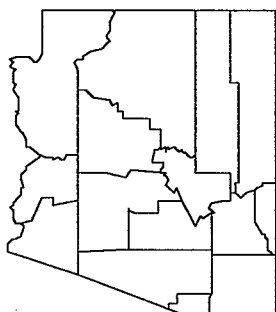
border forum has been critical in the planning for the 1993 World University Games, to be held at locations in Erie and Niagara counties as well as in the Province of Ontario. The existing coordination structure has simplified the development of contingency plans for these events, which will feature athletes from 120 countries and an estimated 500,000 visitors.

**Exercise Pays Off.** As a direct result of the on-going planning between the LEPC and the Crash/Rescue/Fire Division at the Greater Buffalo International Airport, the airport was able to assist the county during a major gasoline leak on November 10, 1990. Responders feared that activities to locate and fix the underground leak might ignite the gasoline, so the airport provided foam trucks to lay a field of foam over the gasoline-affected areas in West Seneca. This protective action minimized the danger of an explosion that could have injured neighbors, motorists, and emergency responders, and also speeded activities to protect the environment from further gasoline contamination.

**Facilities are Partners, not Targets.** Beyond their direct support for the Erie County Hazardous Materials Organization, industry in Erie County has become increasingly involved in the preparedness activities of the LEPC, going well beyond the submission of emergency planning information. This willingness is further demonstrated by the selection of an industry representative, rather than the usual emergency management or other public official, to serve as the chairman of the LEPC. In addition, an industry hazardous materials advisory council has expressed interest in sending facility personnel to participate in the Public Safety Critical Incident Management System.

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## State of Arizona

**T**he Arizona Division of Emergency Management (ADEM) is designated by state law as the lead agency for implementing Title III. The hazardous materials staff of ADEM is the support arm of the SERC for implementing and performing commission duties and activities, and for integrating EPCRA with the state hazardous materials emergency management program. This is accomplished through the SERC Executive Director who is also the Assistant Director for Hazardous Materials within ADEM. The SERC normally meets three times a year.

The Arizona SERC organized the LEPCs by the 15 county jurisdictions. Emergency management directors/coordinators are an

integral part of LEPC operations and chair the committees in 10 of the 15 jurisdictions.

The SERC/ADEM conducts outreach to build positive relationships among LEPCs, industry, Indian nations, and other groups in the state. Through extensive seminars and workshops, the SERC/ADEM keeps industry and the LEPCs up to date on Title III requirements and changes in the law. The SERC/ADEM stays "on the road," assisting industry during section 313 compliance inspections and chemical safety audits conducted by the U.S. Environmental Protection Agency (EPA), and offering its assistance to Indian nations and to cities along the Arizona/Mexico border as they develop emergency management strategies. The SERC/ADEM has found that the

### SERC Profile

**Membership:** Director of the Arizona Division of Emergency Management and directors or designees of the Arizona Departments of Environmental Quality, Health Services, Public Safety, and Transportation.

An advisory committee to the Commission consists of the State Fire Marshal, the director, chief administrator or designee of the Department of Agriculture, Corporation Commission, Industrial Commission, Arizona Radiation Regulatory Agency, State Mine Inspector, two representatives nominated by the Arizona Fire Chiefs Association, and four private sector representatives.

**Organization:** 15 LEPCs representing the 15 Arizona counties

**Topics:** Outreach  
Training  
Compliance  
Indian Tribes  
International Coordination

best way to meet its Title III responsibilities is through regular communication and outreach to LEPCs and all groups in the state involved in hazardous materials emergency management.

### Outreach

**I**n 1991, the Arizona SERC/ADEM sponsored approximately 20 Title III seminars, lectures, and workshops.

Several of these were developed in conjunction with the Center for Environmental Studies at Arizona State University (ASU). The topics of the seminars range from compliance issues to emergency planning. Industry personnel, government personnel, and other professionals involved in emergency management depend on these programs for accurate and up-to-date information on environmental regulations.

One series of Title III seminars held in conjunction with ASU that began as a half-hour presentation at a Resource Conservation and Recovery Act (RCRA) seminar in 1989, has since become a full-day presentation given twice a year. In November 1991, for example, the SERC/ADEM and the Center for Environmental Studies sponsored a one-day Right-To-Know "refresher course." The seminar was open to government staff, facility representatives, emergency services personnel, professionals from the safety, health, and environment sectors, and the public. Lectures and discussion sessions covered all aspects of Title III.

One of the SERC/ADEM's innovative techniques is incorporating the Emergency Planning and Community Right-to-Know Information Hotline into the seminars, giving seminar attendees the opportunity to experience the hotline first-hand. At a specified time during the seminar, a hotline information specialist calls the seminar and briefly explains the purpose of the hotline. The audience then has the opportunity to ask questions of the specialist regarding use of the hotline. This informal introduction exposes seminar participants to the hotline and increases the likelihood that they will use the hotline in the future.

For three years, the SERC/ADEM has sponsored half-day Title III section 313 workshops following the jointly sponsored ASU seminars. The workshops, conducted with representatives from EPA, give industry representatives and the

public an opportunity to discuss section 313 requirements with both federal and state officials. Topics covered during these workshops include changes to Form R reporting requirements and the new Pollution Prevention Act requirements.

Other Title III seminars and workshops are sponsored jointly by the Arizona SERC/ADEM and the EPA Region 9 office. In 1990, for example, the SERC/ADEM, EPA Headquarters, and EPA Region 9 conducted two hazards analysis workshops in Arizona for over 100 LEPC representatives, industry personnel, and fire fighters. The workshops stressed the importance of each facility conducting its own hazards analysis with the public sector also conducting a community-based analysis. The philosophy behind this approach is that, although facilities may know more about chemicals they store or use, the public sector has greater overall knowledge of the makeup (e.g., sensitive populations, ecosystems) of the community.

Participants at the workshop learned to use the *Technical Guidance for Hazards Analysis*, also known as the "Green Book" as a tool for conducting community-based hazards analysis. The participants completed worksheets about chemicals in their communities before coming to the workshop and then were able to work out "real life" problems with the help of the SERC/ADEM and EPA representatives. The workshop not only provided an introduction to community-based hazards analyses, but also prepared participants to conduct full-scale hazards analyses on their own. In addition, the workshops also provided a basis for participants to use hazards analysis data incorporated in the Computer-Aided Management of Emergency Operations (CAMEO) DOS program.

Additional SERC/ADEM-sponsored workshops for the Arizona LEPCs cover topics such as risk communication, liability, emergency management, CAMEO, and the Aerial Locations of Hazardous Atmospheres system (ALOHA) - an air dispersion model that allows the user to estimate the movement and dispersion of an air release. In an effort to keep the LEPCs up-to-date, the SERC/ADEM offers financial assistance to the LEPCs for transportation to the workshops and always encourages them to attend.

### Information Management Using CAMEO DOS

Following the initial development of CAMEO DOS — a computer system that provides a wide variety of databases, including information on facilities and the chemicals they store, transportation, and local street maps to assist emergency responders — the Arizona SERC/ADEM was selected by EPA to be a “beta test” site for the CAMEO DOS software. Upon successful completion of the beta test, the SERC/ADEM elected to implement CAMEO at the state and LEPC levels. The CAMEO DOS software as well as additional computer hardware were purchased to provide each LEPC the equipment necessary to work with their respective county map file and planning data. The SERC/ADEM has created maps for each of the LEPCs jurisdictions using the MARPLOT conversion program and the U.S. Census Bureau’s CD-ROM TIGER/line files. The maps can be used to present a street-by-street identification of sensitive populations and the locations of hazardous chemicals.

To expedite establishing a statewide CAMEO system, EPA assisted in developing an import program to convert Arizona’s existing database into CAMEO. This program converted all the Title III data received prior to 1990, which covered some 3,500 facilities and over 5,000 chemicals. An additional 1,700 facilities filed in 1991 and were incorporated into the database. The LEPCs and all state emergency response organizations receive their jurisdictional information via diskette. Fire departments can obtain this information by contacting the SERC/ADEM or the LEPC in their area.

In October 1991, the SERC/ADEM conducted a CAMEO DOS train-the-trainer course. Two members of the SERC/ADEM and seven emergency responders from fire departments from around the state attended. These individuals are now available to provide training throughout the state. Following the train-the-trainer course, four two-day “Introduction to CAMEO DOS” courses were conducted in 1991. Students in the introduction courses included personnel from the LEPCs, state emergency response organizations, and various fire departments that also have CAMEO. In all, over 45 personnel were trained in the five courses.

This year, the SERC/ADEM will conduct two CAMEO DOS introduction courses. There will also be three CAMEO DOS advanced workshops that will include training on the Aerial Locations of Hazardous Atmospheres (ALOHA) system.

### Training

**T**raining is another key element to supporting LEPC and local emergency response personnel. As of June 30, 1992, the Arizona SERC/ADEM conducted and/or sponsored 172 hazardous materials emergency response training activities reaching 3,286 students statewide. A two-person training staff and a cadre of part-time state certified instructors are responsible for preparing Arizona’s responders for hazardous materials incidents.

Arizona’s courses are consistent with the training requirements of 29 CFR 1910.120 (q) and with the National Fire Protection Association’s Professional Standard 472. First Responder Awareness, First Responder Operational and Technician courses are the most requested training activities. In addition, the SERC/ADEM sponsors emergency response courses offered locally by EPA.

Arizona recognizes the importance of supporting the needs of emergency responders by providing training, by making them part of the planning process, and by providing them with facility data. The SERC/ADEM coordinates all these elements to ensure that emergency response personnel are prepared to protect the public, the environment, and themselves.

### Compliance

**T**he majority of the SERC/ADEM’s outreach efforts are geared towards helping industry in Arizona meet the requirements of Title III. A primary objective of the SERC/ADEM is to “soften the blow” of Title III reporting requirements by offering assistance and education to facilities covered by the law. For example, the ADEM Title III coordinator is present at facilities during section 313 compliance inspections conducted by EPA. The Title III coordinator assists facilities by

answering questions, interpreting the law, and helping assemble the documents needed by the inspector. This methodology gives the SERC/ADEM an opportunity to talk with facility managers and be sure the managers know what is expected of them under all parts of Title III, not only section 313.

Another way the SERC/ADEM has helped ease the burden of Title III reporting for industry is by modifying the federal Tier II reporting form to better fit the needs of industry in Arizona. The SERC/ADEM rewrote the instructions for the form and removed any reference to the Tier I form, since the Tier II is mandated in Arizona. The new instructions include local phone numbers that facilities can call with questions about Tier II.

The SERC/ADEM also developed a Tier Report Error Notification Data Sheet (TRENDS) that identifies any error(s) on the Tier II submissions. The Tier II report and TRENDS package is returned to the submitter who is directed to the appropriate portion of the instructions to correct the error(s) or asked to contact the SERC/ADEM staff for guidance. The facility then resubmits its corrected Tier II to all reporting agencies and is better prepared for submitting accurate reports in the future. "Helping people not make errors" is the SERC/ADEM's objective, says Dan Roe, the Title III coordinator.

The SERC/ADEM also participates with facility visits conducted under EPA's Chemical Safety Audit (CSA) program. The CSA program is designed to heighten awareness of the need for chemical safety among chemical producers, distributors, and users. Chemical safety audits consist of interviews with facility personnel and on-site reviews of various aspects of facility operations related to the prevention of accidental chemical releases. A representative from the Arizona SERC/ADEM has accompanied the EPA audit teams on every chemical safety audit conducted in Arizona in order to assist facilities and EPA during the audits.

The SERC/ADEM representative visits facilities before an audit is conducted to go over the audit process and to encourage the facility to prepare a briefing for the audit team. Briefings generally provide an overview of the facility, its chemical

processes, and other operations such as shipping and receiving practices and storage methods. All Arizona facilities that have been audited have prepared a briefing that has assisted the facility, the audit team, the LEPC, and the SERC/ADEM by providing background information about the facility's management of chemical process safety.

### Indian Tribes

Arizona outreach efforts also extend to Indian nations. The state is home to 20 Indian nations with a wide variety of privately-owned industries located on their land. While some Indian nations or tribes have the capability to handle emergency response independently, the state hazardous materials emergency response team from the Departments of Public Safety and Environmental Quality will respond to emergencies at an Indian nation's or tribe's request.

The SERC/ADEM is very interested in maintaining a partnership with the Indian nations as they develop strategies for implementing Title III. At one tribe's request, the SERC/ADEM met with tribal leaders to discuss Title III and hazardous materials emergency preparedness so that, as one SERC/ADEM representative said, "the tribes don't have to reinvent the wheel." These meetings also provide an opportunity for the tribes and the SERC/ADEM to exchange information on chemicals stored at facilities within the reservations and on the periphery of their boundaries. Such an exchange benefits both the tribes and the SERC/ADEM as they develop or modify existing emergency response plans.

Emergency response exercises are conducted occasionally by the SERC on Indian reservations at the tribes' request. The SERC/ADEM recently assisted in conducting such an exercise at Peach Springs, on the Havasupai Reservation. This was a table-top exercise based on a transportation accident involving hazardous materials. Tribal leaders, the chair of the Mohave County LEPC (also the director of the nearby Mohave County Emergency Services Division), public safety officials, and others in attendance worked through the problems of handling the spill and coordinating the response



among different agencies (e.g., hospitals, fire departments, police). Exercises such as the one in Peach Springs increase the county's and tribes' awareness of the need for emergency preparedness and provide the opportunity to smooth out problems in response plans before real emergencies occur.

All in all, the SERC/ADEM's efforts to assist Indian tribes have been very well received. The SERC/ADEM has worked directly with at least four tribes on emergency management issues. Two of the tribes have set up TERCs of their own and the SERC/ADEM is working to help other tribes do the same.

### International Coordination

**I**n addition to its involvement with sovereign Indian nations, the Arizona SERC/ADEM, in coordination with EPA Region 9, participates in outreach to communities along the U.S./Mexico border. The SERC/ADEM began working with EPA and the United States/Mexico Inland Joint Response Team (JRT) over a year ago and the executive director of the SERC is a member of the JRT. The JRT coordinates preparedness and response activities for hazardous substance emergency incidents along the joint U.S./Mexico inland border. The JRT is activated in the event of a significant hazardous substance incident in the border area. Additionally, the JRT serves as a conduit for information about each country's hazardous substance emergency preparedness and response activities.

Emergency response planning for small spills along the border is handled by EPA, the states, and the 14 pairs of Sister Cities designated along the U.S./Mexico border. The Sister Cities work in pairs to plan emergency notification procedures and joint hazardous materials responses in the event of an accidental chemical release on either side of the border. The Directors of EPA's Chemical Emergency Preparedness and Prevention office (CEPPO) and the Secretaria de Desarrollo Social (SEDESOL) serve as Co-chairs of the JRT.

Other members of the JRT include regional EPA, federal and SEDESOL officials, as well as SERCs and LEPCs located in the border area.

The SERC/ADEM provides technical assistance to the four border towns in Arizona that are working on Sister City plans with their Mexican counterparts. The SERC/ADEM recently held a Public Officials Conference for the Sister City pair of Douglas, AZ, and Agua Prieta, Sonora, to provide an orientation on hazardous materials emergency management programs and planning activities of the United States and Arizona. City managers, public works employees, and mayors attended the conference and learned about issues such as environmental laws, liability, Sister Cities hazardous materials plans, and EPA and SEDESOL's roles in the JRT.

The SERC/ADEM recently participated in a three-day hazardous materials first responder training course conducted by the University of California (Davis) for first responders in the border area. Topics covered included safety during hazmat incidents, instruction in the use of the DOT Emergency Response Guidebook, identification of hazardous materials, field decontamination, agency coordination, and contingency planning. A similar emergency response training course was held for the Sister City pairs of Nogales, Sonora/Nogales, AZ and San Luis, Rio Colorado/Yuma, AZ. All of the training courses for emergency responders on both sides of the border are conducted in both English and Spanish.

### LESSONS LEARNED

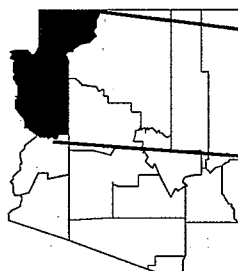
**Constantly Going to the Basics.** Recognizing that environmental laws such as Title III can be overwhelming for industry when looked at all together, the SERC acts as a funnel, receiving information from the federal level on new requirements for industry and then consolidating this information into more digestible forms. The information is conveyed to industry throughout the state through seminars, workshops, and the Arizona LEPCs.

**Keeping Linked with Other Programs.** In order to be most helpful to industry, the SERC/ADEM goes beyond its primary role of implementing Title III by staying current on other, related programs, such as RCRA and the Clean Air Act. Members of the SERC/ADEM believe they "can't work within a box" where they understand only Title III. The SERC/ADEM wants to understand how the many programs that relate to emergency management overlap so that they can clarify confusing issues for industry in the state.

**Developing a Partnership with Indian Nations.** The SERC/ADEM views its relationship with Indian nations as a partnership, where the sovereignty of the tribes is fully recognized. The SERC/ADEM explains the lessons they learned so that the tribes can avoid some of the pitfalls they may encounter. The interaction between the SERC/ADEM and the tribes is beneficial to the SERC/ADEM as well, because the tribes can assist the SERC/ADEM by sharing information about facilities handling hazardous chemicals on their land.

**Contact:**

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## Mohave County, Arizona

**M**ohave County is home to some of the largest natural and man-made points-of-interest in the United States, including the Grand Canyon, the Hoover Dam, and portions of the Colorado River. Set in the northern and western portions of Arizona, Mohave County has the fifth largest area of any county in the U.S. There are three primary population centers in the county: Kingman, Lake Havasu City, and Bullhead City, each with a population of approximately 20,000, and each separated from the others by 40 miles or more. An industrial park, including light industry such as a cable company, a boatmaker, and a housewares warehouse, is located in Kingman. The industrial park also contains a Union Carbide facility. There are two major transportation routes: Highway 93, which runs

north to south, and I-40, which run east to west through the county. There is also one major railroad through the county — the Atchison/Topeka/Santa Fe (ATSF).

### LEPC Organization

**T**he structure of the LEPC allows for maximum county-wide participation.

Three subcommittees have been established to handle emergency planning for the facilities in each of the three main cities — Kingman, Lake Havasu City, and Bullhead City. The LEPC meets every two months on a rotating schedule among the three major cities. Because the county is extremely large, this schedule was established to increase the opportunity for interested parties to participate in meetings

### LEPC Profile

**Membership:** 28 members including, representatives from the Mohave County Board of Supervisors; Mohave County Emergency Services; industrial facilities; medical services; city police and fire departments; Mohave County Sheriff's Office; media; Kingman Area Chamber of Commerce; Citizens Against Toxic Substances (C.A.T.S.); Bureau of Land Management-Kingman Resource Area; and private citizens (chair: Mohave County Emergency Services Director).

**Population:** 93,500

**Facilities:** 40, including a Union Carbide plant; approximately 4-5 facilities report under section 302, 60 (including 20 service stations) under section 312.

**Topics:** LEPC Organization  
Inter-jurisdictional Coordination  
Exercises  
Emergency Planning

without having to travel extensively. A core of about half of the members attend all meetings.

In general, media representatives, although members of the LEPC, do not attend meetings regularly due to travel requirements (except for the Bullhead City representative). However, because the media has participated on the LEPC in the past, a strong relationship has developed between the media and the LEPC, and the media has been very cooperative in helping the LEPC disseminate information to the public. To date, press releases have been the LEPC's primary outreach mechanism to the community, although they are interested in improving their outreach programs.

Although relatively few facilities that handle hazardous chemicals are in Mohave County, there is a cluster of significant industrial activity at the Kingman Industrial Park, near the Kingman Airport. A Union Carbide facility produces arsine and phosphine gases, and another large facility in the industrial park manufactures ethylene oxide.

In 1998, concerned community members formed Citizens Against Toxic Substances (C.A.T.S.) as a result of the proposed opening of the Union Carbide facility. Over 8,000 signatures opposing the plant opening were collected by the C.A.T.S. organization. The public outcry over the use of hazardous substances such as ethylene oxide so close to a population center caused Union Carbide to relocate a portion of the facility — the most hazardous operations were moved to a location 14 miles outside of Kingman. As a result, Union Carbide has also become actively involved in the LEPC — the Union Carbide plant manager is a member of the LEPC and is head of the LEPC's Kingman district subcommittee.

### Inter-Jurisdictional Coordination

**M**ohave County recognizes the need to coordinate with nearby communities to mitigate potential hazards and promote information and idea sharing. As part of this process, Mohave County conducted a peer exchange workshop with Clark County, Nevada in October 1991. The peer exchange program is a relatively new grant program run through the International City Managers Association (ICMA). The process is simple: LEPCs apply

to ICMA, and ICMA matches up LEPCs that will benefit from an exchange with those that feel they have valuable information or programs to share. At the Mohave-Clark workshop, the participants decided that they would take part over the next year in mutually beneficial activities such as sharing hazardous materials planning information, identifying facilities along the Clark County-Mohave County boundary that pose concerns for people in both counties, conducting a cooperative emergency response exercise, and completing mutual aid plans for emergency response. Clark County is directly to the west of Mohave County and is home to Las Vegas and Henderson, the site of the 1988 explosion at an ammonium perchlorate rocket fuel plant. The fire departments in the two counties will be holding a joint exercise in October 1992; a peer exchange between Clark County and Mohave County is scheduled to follow the drill.

### Exercises

**T**he exercise being planned for the fall of 1992 is only one portion of Mohave County's exercise program. In fact, the Mohave County LEPC has been very active in holding exercises. In the past year there have been two field exercises, one involving a transportation incident and one a fixed facility. The fixed facility field exercise involved a simulated leak from a one ton chlorine cylinder from the City of Kingman swimming pool, planned by Kingman Fire Department and Kingman hospital. Both a school and a hospital are within the vulnerable zone of the chlorine facility. The vulnerability displayed by the exercise really "hit home" with the community and has led to tangible prevention measures. As a result of the exercise, the city plans to replace chlorine gas with dry chlorine for public swimming pools by the summer of 1992. This type of prevention is a cornerstone of the Mohave County LEPC philosophy.

### Emergency Planning

**W**hile the LEPC will review and revise its emergency plans as a follow-up to its exercises and accidents, it also conducts an annual plan review. The three subcommittees each have plans specifically addressing reporting facilities. Subcommittee plans are revised when new reporting facilities enter the district.

Because the community is small, the subcommittees are able to find out about the opening of new plants that would be subject to section 302 reporting through word of mouth and local news coverage.

Mohave County is also the home to three Native American Reservations: the Kaibab Reservation, the Fort Mohave Reservation, and the Hualapai Reservation. The County Department of Emergency Services is working with Hualapai Native Americans to assist in developing a tribal emergency operations plan containing an emergency response plan for hazardous materials.

A tabletop exercise based on a transportation accident, the first to involve the tribe, was conducted on May 4, 1992, in Peach Springs. Tribal leaders, the LEPC Chair, public safety officials, and others addressed the problems associated with handling the spill and coordinating the response among different local agencies. In addition to holding their exercise, the tribe is considering establishing its own Tribal Emergency Response Commission (the equivalent of the SERC). Exercises and programs such as these will increase the tribe's awareness of emergency preparedness and, hopefully, will inspire the other tribes to do the same.

## LESSONS LEARNED

**A Well-Rounded LEPC Equals Compromise and Good Community Relations.** Many different organizations and groups within the county have representatives on the 28-member Mohave County LEPC. This blend of individuals not only assures widespread community representation, but also provides a useful forum for the exchange of differing viewpoints. Because everyone from industry to environmental groups has a voice on the LEPC, the group works to achieve a balanced program.

Since October 1989, a representative from Citizens Against Toxic Substances (C.A.T.S.), the first local grassroots environmental organization in Mohave County, has been a participant on the LEPC. The C.A.T.S. representative joined the LEPC during the conflict over the Union Carbide plant siting, and although initially intimidated and uncomfortable

"Most fundamentally, the two sides learned how to talk to one another in Kingman, and that is no small doing."

Chemical & Engineering News,  
January 7, 1991

working with facility representatives, the C.A.T.S. representative believes that the LEPC provides a useful forum for the exchange of ideas. The Mohave County LEPC has learned that there is a "human factor" involved in emergency planning and wants the community to know that the LEPC is more than just technicians and government employees. It is important that everyone has an equal voice and that the LEPC is a good way for different facets of the community to express their concerns. The diversity of the planning committee forces individuals with disparate viewpoints to overcome their differences and address safety problems that pose risks to the community.

Another important focus of the Mohave County LEPC is learning from past experiences and developing future programs to best suit the needs of the community. The group believes in "immediate corrective action" and when they see problems, they attempt to address them quickly and determine a safer and more effective course of action. For example, when a safety device on a nitrogen storage vessel malfunctioned, the sheriff's office immediately came in to help. Because only the fire department has SCBA (self-contained breathing apparatus) equipment, it was important for the sheriff's office to be aware that although they wanted to assist in the response, their services were more useful in securing the area and providing crowd control. This problem was addressed through the LEPC, and when an alarm sounded a short time later, the response process worked smoothly.

## Contact:

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## More Successful Practices

Additional Successful Practices in Title III Implementation technical assistance bulletins are available from your Regional Chemical Emergency Preparedness and Prevention Coordinator (see the listing on the preceding page), or call the Emergency Planning and Community Right-to-Know Information Hotline at (800) 535-0202. The following bulletins are currently available:

### Successful Practices #1

Doc. # OSWER-89-006.1, January 1989.

- State of Kansas
- Washtenaw County, Michigan
- Butler County, Kansas
- Jefferson County, Kentucky

### Successful Practices #2

Doc. # OSWER-89-006.2, August 1989

- Calhoun County, Alabama
- Pampa, Texas
- State of Wisconsin
- Cuyahoga County, Ohio
- Racine County, Wisconsin
- State of Idaho

### Successful Practices #3

Doc. # OSWER-89-006.3, December 1989.

- Woodbury County, Iowa
- State of Virginia
- Fairfax County, Virginia
- Pierce County, Washington

### Successful Practices #4

Doc. # OSWER-90-006.1, March 1990.

- New York, New York
- El Paso County, Colorado
- Alexandria, Virginia
- State of Maine

### Successful Practices #5

Doc. # OSWER-90-006.2, June 1990.

- Tinker Air Force Base, Oklahoma
- State of Connecticut
- Cumberland County, Maine
- Wyandotte County, Kansas

### Successful Practices #6

Doc. # OSWER-90-006.3, September 1990.

- State of Ohio
- Hamilton County, Ohio
- Wallingford, Connecticut
- Ouachita Parish, Louisiana

### Successful Practices #7

Doc. # OSWER-91-006.1, February 1991.

- Cameron County, Texas
- Bucks County, Pennsylvania
- Harford County, Maryland
- Dallas County, Texas

### Successful Practices #8

Doc. # OSWER-91-006.2, October 1991.

- Cherry Hill, New Jersey
- Manitowoc County, Wisconsin
- Greene County, Missouri
- State of Hawaii
- Arapahoe County, Colorado

### Successful Practices #9

Doc. # OSWER-92-006.1, September 1992.

- Natrona County, Wyoming
- Erie County, New York
- State of Arizona
- Mohave County, Arizona

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## States By Region

4 - Alabama  
10 - Alaska  
9 - Arizona  
6 - Arkansas  
9 - California  
8 - Colorado  
1 - Connecticut  
3 - Delaware  
3 - D.C.  
4 - Florida  
4 - Georgia  
9 - Hawaii  
10 - Idaho  
5 - Illinois  
5 - Indiana  
7 - Iowa  
7 - Kansas  
4 - Kentucky  
6 - Louisiana

1 - Maine  
3 - Maryland  
1 - Massachusetts  
5 - Michigan  
5 - Minnesota  
4 - Mississippi  
7 - Missouri  
8 - Montana  
7 - Nebraska  
9 - Nevada  
1 - New Hampshire  
2 - New Jersey  
6 - New Mexico  
2 - New York  
4 - North Carolina  
4 - North Dakota  
5 - Ohio  
6 - Oklahoma

10 - Oregon  
3 - Pennsylvania  
1 - Rhode Island  
4 - South Carolina  
8 - South Dakota  
4 - Tennessee  
6 - Texas  
8 - Utah  
1 - Vermont  
3 - Virginia  
10 - Washington  
3 - West Virginia  
5 - Wisconsin  
8 - Wyoming  
9 - American Samoa  
9 - Guam  
2 - Puerto Rico  
2 - Virgin Islands

## **Successful Practices in Title III Implementation: Subject Index\***

### **Compliance (Enforcement):**

Kansas (SP1:4); Idaho (SP2:14-15); Arapahoe County, Colorado (SP8:26-27)

### **Identifying/contacting facilities:**

Calhoun County, Alabama (SP2:1-2); Fairfax County, Virginia (SP3:9); Alexandria, Virginia (SP4:13); Wyandotte County, Kansas (SP5:15-16); Tinker Air Force Base, Oklahoma (SP5:2); Hamilton County, Ohio (SP6:11); Bucks County, Pennsylvania (SP7:11); Wisconsin (SP2:8); New York, New York (SP4:3-4); Cameron County, Texas (SP7:4); Natrona County, Wyoming (SP9:1-2)

### **Inspections:**

Racine County, Wisconsin (SP2:12); Pampa, Texas (SP2:4-5)

### **Emergency Plans:**

Jefferson County, Kentucky (SP1:9-10); Idaho (SP2:14); Pierce County, Washington (SP3:13); Tinker Air Force Base, Oklahoma (SP5:2); Bucks County, Pennsylvania (SP7:10-11)

### **Community Consequences:**

Racine County, Wisconsin (SP2:12-13); Wallingford, Connecticut (SP6:13)

### **Coordination with other LEPCs and communities:**

Dallas County, Texas (SP7:19); Harford County, Maryland (SP7:14-15); Arapahoe County, Colorado (SP8:23); Erie County, New York (SP9:5-8)

### **Existing plans:**

Cumberland County, Maine (SP5:10-11); Cherry Hill, New Jersey (SP8:1)

### **Facility input:**

New York, New York (SP4:3); Hamilton County, Ohio (SP6:9); Wyandotte County, Kansas (SP5:14-15); El Paso County, Colorado (SP4:6-7); Cuyahoga County, Ohio (SP2:10)

### **Facility plans:**

Fairfax County, Virginia (SP3:9)

### **Hazard analysis:**

Alexandria, Virginia (SP4:11-12); Butler County, Kansas (SP1:7)

### **Planning guidance:**

Connecticut (SP5:5-6); New York, New York (SP4:2), Kansas (SP1:3)

### **Public alert and notification system:**

Wyandotte County, Kansas (SP5:17)

### **Structure:**

Ohio (SP6:1-2)

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\*The citation provided for each profile refers to the issue number (SP3 refers to the third issue of **Successful Practices**) and the page number within that issue.



**Exercises:****Decontamination:**

Greene County, Missouri (SP8:14)

**Evacuation and sheltering:**

Arapahoe County, Colorado (SP8:24); Greene County, Missouri (SP8:14)

**Field programs:**

Woodbury County, Iowa (SP3:2); Cumberland County, Maine (SP5:11); Hamilton County, Ohio (SP6:9-10); Wallingford, Connecticut (SP6:13-14); Ouachita Parish, Louisiana (SP6:21-22); Hawaii (SP8:21); Manitowoc County, Wisconsin (SP8:8); Arapahoe County, Colorado (SP8:24); Mohave County, Arizona (SP9:16); Natrona County, Wyoming (SP9:3)

**Table-top programs:**

Hartford County, Maryland (SP7:15); Dallas County, Texas (SP7:20); Hamilton County, Ohio (SP6:9-10); Cumberland County, Maine (SP5:11); Erie County, New York (SP9:7); Arizona (SP9:12-13); Mohave County, Arizona (SP9:17)

**Funding:****Citizen Suits:**

Erie County, New York (SP9:7)

**Donations:**

Jefferson County, Kentucky (SP1:10); Calhoun County, Alabama (SP2:2); Pierce County, Washington (SP3:14); Cameron County, Texas (SP7:4); Bucks County, Pennsylvania (SP7:9)

**Fee systems:**

Kansas (SP1:4); Washtenaw County, Michigan (SP1:5); Calhoun County, Alabama (SP2:2); Wisconsin (SP2:7); Fairfax County, Virginia (SP3:10); Maine (SP4:16-18); Ohio (SP6:3)

**Grants:**

Connecticut (SP5:6)

**State and local agency budgets:**

Jefferson County, Kentucky (SP1:10); Wisconsin (SP2:7); Connecticut (SP5:6); Ohio (SP6:3); Bucks County, Pennsylvania (SP7:9); Hartford County, Maryland (SP7:16); Dallas County, Texas (SP7:20)

**Hazards Analysis:****Hazard identification:**

Cuyahoga County, Ohio (SP2:9-10); Wyandotte County, Kansas (SP5:13-14); Hamilton County, Ohio (SP6:7-9); Arapahoe County, Colorado (SP8:23-24); Alexandria, Virginia (SP4:11-12)

**Hazards Incidents Complexity Analysis:**

Kansas (SP1:3); Wyandotte County, Kansas (SP5:13-14)

**Risk analysis:**

Hamilton County, Ohio (SP6:8-9); Dallas County, Texas (SP7:19)

**Hazards Analysis (continued):****Transportation:**

Kansas (SP1:3); Butler County, Kansas (SP1:7); Alexandria, Virginia (SP4:11-12)

**Vulnerability zones:**

Cuyahoga County, Ohio (SP2:9); Hamilton County, Ohio (SP6:7-9); Wallingford, Connecticut (SP6:14-15); Greene County, Missouri (SP8:13-14)

**Information Management (Computer Systems):****CAMEO:**

Jefferson County, Kentucky (SP1:10); Racine County, Wisconsin (SP2:13); Pampa, Texas (SP2:5); El Paso County, Colorado (SP4:7); New York, New York (SP4:2); Wallingford, Connecticut (SP6:14); Hamilton County, Ohio (SP6:10); Bucks County, Pennsylvania (SP7:8); Arapahoe County, Colorado (SP8:25); Hawaii (SP8:17-19); Greene County, Missouri (SP8:13); Cherry Hill, New Jersey (SP8:2-3); Wyandotte County, Kansas (SP5:16); Arizona (SP9:10); Natrona County, Wyoming (SP9:3)

**Conversion software:**

Greene County, Missouri (SP8:13)

**dBase:**

El Paso County, Colorado (SP4:7); Bucks County, Pennsylvania (SP7:9); Natrona County, Wyoming (SP9:1-2)

**Dispatch system:**

Bucks County, Pennsylvania (SP7:9)

**Modified reporting format:**

Ohio (SP6:2), Oauchita Parish, Louisiana (SP6:20), Hawaii (SP8:19)

**Networks:**

Idaho (SP2:15)

**"Packet" radio:**

El Paso County, Colorado (SP4:7); Cherry Hill, New Jersey (SP8:3)

**Software programs:**

Kansas (SP1:3-4); Pampa, Texas (SP2:5-6); Virginia (SP3:5-6); Fairfax County, Virginia (SP3:9-10); New York, New York (SP4:1-2); Tinker Air Force Base, Oklahoma (SP5:2-3); Connecticut (SP5:6-7); Hamilton County, Ohio (SP6:10); Oauchita Parish, Louisiana (SP6:21); Bucks County, Pennsylvania (SP7:8); Arapahoe County, Colorado (SP8:25); Natrona County, Wyoming (SP9:3)

**Worksheet forms:**

Washtenaw County, Michigan (SP1:5)

**LEPC Coordination:****Coordination with SERC:**

Hamilton County, Ohio (SP6:10); Kansas (SP1:2)

**Federal facilities:**

Tinker Air Force Base, Oklahoma (SP5:1)

**Inter-LEPC coordination:**

Virginia (SP3:4-5); Alexandria, Virginia (SP4:12-13); Wyandotte County, Kansas (SP5:17); Woodbury County, Iowa (SP3:3); Mohave County, Arizona (SP9:16)

**International coordination:**

Maine (SP4:18); Cameron County, Texas (SP7:1-3); Arizona (SP9:13); Erie County, New York (SP9: 5-8)

**LEPC Organization:****Pre-SARA/Title III organizations:**

Bucks County, Pennsylvania (SP7:7-8); Cherry Hill, New Jersey (SP8:1); Hawaii (SP8:19-20); Racine County, Wisconsin (SP2:11); Woodbury County, Iowa (SP3:1-2)

**Subcommittees:**

Calhoun County, Alabama (SP2:2); Ouachita Parish, Louisiana (SP6:17-18); Bucks County, Pennsylvania (SP7:7-8); Greene County, Missouri (SP8:11-13); Pampa, Texas (SP2:4); Jefferson County, Kentucky (SP1:10); Mohave County, Arizona (SP9:15-16)

**Liability:**

Virginia (SP3:5); Pierce County, Washington (SP3:15); Maine (SP4:16)

**Outreach Programs:**

Wisconsin (SP2:8); Hawaii (SP8:19)

**Agriculture:**

Racine County, Wisconsin (SP2:11-12); Manitowoc County, Wisconsin (SP8:6-7)

**Audio/Visual Aids:**

Virginia (SP3:4-5); Ohio (SP6:2-3); Harford County, Maryland (SP7:15); Cherry Hill, New Jersey (SP8:4)

**Brochures, factsheets, and booklets:**

Kansas (SP1:2); Cuyahoga County, Ohio (SP2:10); Idaho (SP2:14); New York, New York (SP4:4); Hamilton County, Ohio (SP6:10); Wallingford, Connecticut (SP6:15); Harford County, Maryland (SP7:15); Arapahoe County, Colorado (SP8:25)

**Guidelines:**

Cuyahoga County, Ohio (SP2:10); Virginia (SP3:4-5)

**Indian Tribes:**

Arizona (SP9:12-13)

**Outreach Programs (continued):****Industry:**

Virginia (SP3:4-5); Arizona (SP9:9-11)

**Lectures & workshops:**

Butler County, Kansas (SP1:7); Idaho (SP2:14); Pierce County, Washington (SP3:14); New York, New York (SP4:4); Connecticut (SP5:7); Dallas County, Texas (SP7:20); Cameron County, Texas (SP7:4); Manitowoc County, Wisconsin (SP8:6-8); Arizona (SP9:10-13); Natrona County, Wyoming (SP9:2-3)

**Library displays:**

Pierce County, Washington (SP3:14); El Paso County, Colorado (SP4:8)

**Local government:**

Cherry Hill, New Jersey (SP8:4)

**Mailing lists:**

New York, New York (SP4:4)

**Media Use (TV, radio, newspaper):**

Kansas (SP1:3); Butler County, Kansas (SP1:7); Woodbury County, Iowa (SP3:2); Fairfax County, Virginia (SP3:10); Pierce County, Washington (SP3:14); El Paso County, Colorado (SP4:8); Tinker Air Force Base, Oklahoma (SP5:3); Oauchita Parish, Louisiana (SP6:18-20); Cameron County, Texas (SP7:4); Dallas County, Texas (SP7:20); Manitowoc County, Wisconsin (SP8:6-8); Harford County, Maryland (SP7:15); Natrona County, Wyoming (SP9:2,4); Mohave County, Arizona (SP9:16)

**Public schools:**

El Paso County, Colorado (SP4:8)

**Prevention:**

Washtenaw County, Michigan (SP1:5); Hamilton County, Ohio (SP6:11)

**Public Alert System:**

Wyandotte County, Kansas (SP5:17)

**Reporting Modifications:**

Ohio (SP6:2); Oauchita Parish, Louisiana (SP6:20); Hawaii (SP8:19)

**Right-to-Know Laws:**

Washtenaw County, Michigan (SP1:5); Wisconsin (SP2:8); Maine (SP4:15-16); Wyandotte County, Kansas (SP5:16-17); New York, New York (SP4:4)

**Section 313 Data:****Accessibility and analysis:**

Connecticut (SP5:8); El Paso County, Colorado (SP4:9); Ohio (SP6:3-5); Dallas County, Texas (SP7:18); Virginia (SP3:6)

**Compliance:**

Fairfax County, Virginia (SP3:8); Ohio (SP6:4)

**Special Planning Features:****Chemical Stockpile Disposal Program facilities:**

Harford County, Maryland (SP7:16)

**Federal facilities:**

Tinker Air Force Base, Oklahoma (SP5:2); Harford County, Maryland (SP7:14)

**Hospital Preparedness:**

Erie County, New York (SP9:6-8)

**Indian Tribes:**

Mohave County, Arizona (SP9:12-13)

**Nursing homes:**

Cherry Hill, New Jersey (SP8:4)

**Schools:**

Wallingford, Connecticut (SP6:13); Harford County, Maryland (SP7:14)

**Transportation:**

Alexandria, Virginia (SP4:11-12); Ouachita Parish, Louisiana (SP6:21-22)

**Training Programs:****Coordination with government organizations:**

Virginia (SP3:4); El Paso County, Colorado (SP4:8); Tinker Air Force Base, Oklahoma (SP5:3); Connecticut (SP5:7); Bucks County, Pennsylvania (SP7:11); Hawaii (SP8:20)

**Facility management personnel:**

Tinker Air Force Base, Oklahoma (SP5:3); Bucks County, Pennsylvania (SP7:11)

**First-responders:**

Pierce County, Washington (SP3:13-14); El Paso County, Colorado (SP4:8); Tinker Air Force Base, Oklahoma (SP5:3); Connecticut (SP5:7); Cumberland County, Maine (SP5:11); Wallingford, Connecticut (SP6:15); Harford County, Maryland (SP7:15); Cherry Hill, New Jersey (SP8:3-4); Cameron County, Texas (SP7:3); Arizona (SP9:13)

**Hazmat team personnel:**

Jefferson County, Kentucky (SP1:9); Pampa, Texas (SP2:5); Virginia (SP3:4); Connecticut (SP5:7); Harford County, Maryland (SP7:15); Hawaii (SP8:20)

**Training Programs (continued):****LEPC:**

Kansas (SP1:3); Virginia (SP3:4); Alexandria, Virginia (SP4:13-14); Connecticut (SP5:7)

**Medical personnel:**

Racine County, Wisconsin (SP2:12)

**Potential CAMEO users:**

Cherry Hill, New Jersey (SP8:3-4)

**Public:**

Bucks County, Pennsylvania (SP7:11)

**Train-the-Trainer:**

Idaho (SP2:15); Maine (SP4:18); Cherry Hill, New Jersey (SP8:4); Erie County, New York (SP9:7)

**Vulnerability Analysis:**

Cuyahoga County, Ohio (SP2:9); Hamilton County, Ohio (SP6:8); Wallingford, Connecticut (SP6:14-15); Greene County, Missouri (SP8:13-14)

**HIRT:**

Bucks County, Pennsylvania (SP7:11)